

mheller@sabety.net

From: Yaakov Saks <ysaks@SteinSaksLegal.com>
Sent: Wednesday, July 17, 2019 1:35 PM
To: ted@sabety.net; David Force
Cc: mheller@sabety.net
Subject: RE: Adjournment of Pre Trial Conference Traynor v Hereafter STATEMENT UNDER FRE 408

Ted,

That not an offer, we could do that without your clients permission right now. I need your client to put some money on the table for me to push my client.

Yaakov

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Stein Saks, PLLC

From: ted sabety <ted@sabety.net>
Sent: Wednesday, July 17, 2019 1:30 PM
To: Yaakov Saks <ysaks@SteinSaksLegal.com>; David Force <dforce@SteinSaksLegal.com>
Cc: mheller@sabety.net
Subject: RE: Adjournment of Pre Trial Conference Traynor v Hereafter STATEMENT UNDER FRE 408

Yaakov,

Here is our counteroffer:

If Plaintiff drops the case with prejudice and pays Areaware for its costs defending the case, Areaware will not to seek sanction from the court.

Regards,

-t

From: Yaakov Saks <ysaks@SteinSaksLegal.com>
Sent: Wednesday, July 17, 2019 12:01 PM
To: ted@sabety.net; David Force <dforce@SteinSaksLegal.com>
Cc: mheller@sabety.net
Subject: RE: Adjournment of Pre Trial Conference Traynor v Hereafter

Good morning,